

Thank you for the opportunity to comment on the proposed Tongass National Forest (TNF) Draft 5 Year Transition Plan 2010-2014 (the "Plan"). As one of the first significant agency products of a broader TNF transition process, it is important to understand what we are transitioning from in order to understand the Plan, and just as importantly, what we are transitioning to and how this is being accomplished.

We are, of course, transitioning from the disastrous decades of the pulp mill era on the Tongass, in which subsidies to corporations consisting of hundreds of millions of taxpayer dollars were used to build 4-5000 miles of logging roads and clearcut at unsustainable rates, hundreds of thousands of acres of increasingly rare and highly valuable oldgrowth temperate rainforest. This Plan represents how the agency intends to deal with their legacy of mismanagement resulting in significant environmental damage, now requiring by their own admission, "restoration and stewardship".

We are transitioning to, (what will likely become) the far more disastrous decades marked by climate change and ocean acidification (CC/OA) accelerated by the coming pellet fuel/biomass era on the Tongass. It is an era, again, in which hundreds of millions of taxpayer dollars will be funneled into corporate coffers to produce "renewable energy" known to result in massive, (though unnecessary), carbon emissions directly accelerating CC/OA. This will occur in a region rich with multiple forms of world class, untapped reserves of renewable energy. Energy which is free of carbon emissions. Energy which when harvested, would not compromise ecosystem services such as carbon absorption functions. Energy which would not force choices between endemic species survival and subsistence or economic livelihood. Energy which would not contribute to the acceleration of CC/OA which trigger tipping points into the realm of "irreversible, catastrophic climate change" (Dr. James Hansen)

This transition would not be possible without the establishment of the Tongass Futures Roundtable (TFR) described to the public through a seamlessly framed official narrative dutifully reported in the media as "collaboration". A cursory glance beyond the official narrative raises important questions not only of the collaborative process but why the media routinely violates the ethics and elements of journalism by refusing to look beyond the official explanation.

Were the media to fulfill their first obligation -- to truth -- the public would find the Plan and the transition is the product of what economists and social scientists refer to as [regulatory capture](#).

"**Regulatory capture** occurs when a [state](#) regulatory agency created to act in the public interest instead acts in favor of the commercial or special interests that dominate in the industry or sector it is charged with regulating. Regulatory capture is a form of [government failure](#), as it can act as an encouragement for large firms to produce [negative externalities](#). The agencies are called Captured Agencies."

Transition: Captured Agencies, Devolved Process, Privatization, Deregulation

With this Plan the United States Forest Service, as a regulatory agency charged with acting in the public's best interest, demonstrates it has been "captured". Diagnostic of this condition, is the agency's rebranding of the familiar silvicultural practice of pre-commercial thinning as "stewardship", adopting the same marketing language as the corporate front groups it is ceding many of its management functions to.

Given the departure from agency responsibility, regulatory function and public process this Plan represents, and that there is so little specific information provided by this agency by which the public can make informed comments, we can only assume this "transition" is an attempt to manage public lands by decree. The role of the Tongass Futures Roundtable (TFR), was central to this Plan, functioning as a body of financially conflicted corporate, bureaucratic and stakeholder agents, providing the pretense of public process.

As the Government Accounting Office report to Congress (GAO-04-328) makes clear, "Because advisory committees are established to advise federal decision makers on significant national issues, it is essential that their membership be, and be perceived as being, free from conflicts of interest and balanced as a whole."

To achieve this, the GAO recommended practices and measures which would "ensure independence" of its members and "promote transparency of its process", particularly for committees addressing sensitive or controversial topics ... to prevent them from being perceived as biased or imbalanced."

This is clearly not the case with the self-selecting, exclusive membership of the Tongass Futures Roundtable, which disallows news media and the public from recording its proceedings, and feels no obligation to make a record of, incorporate, or even respond to, public comments addressing the discussions and matters at hand of the TFR.

Given the role of corporate foundation funding in the form of several millions of dollars of restricted grants paying the salaries of those agents purported to represent environmental concerns at TFR, its proceedings and policy recommendations cannot claim to be free from conflicts of interest.

That TFR was designed and promulgated during the Bush administration by former timber industry lobbyist Mark Rey, questions of bias and balance inevitably arise. In short, this Plan along with TFR, has all the appearances of a successful corporate coup d'etat handily effecting devolution of public process, deregulation of environmental and procedural law, and corporate outsourcing of agency responsibilities and functions.

That TFR has already attempted to establish at one point a 180,000 acre "Private Timber Trust", and later attempted to establish a 1 million acre State Forest, and still

That TFR, early on passed and approved an unprecedented biomass industry on the Tongass, while its membership ignored the vast body of scientific evidence of carbon sink functions of oldgrowth, and the world class reserves of sequestered carbon within the TNF, raises serious ethical, environmental, and socio-economic questions of TFR recommendations.

The 5 year Transition Plan Explained -- and Simplified Public Process Fulfilled

- [illegible]

[illegible]

- 4) Implement 5 yr. Transition Plan

Conclusion

- The condition of regulatory and agency capture which results in devolution of public process, clear conflicts of interest, exclusivity of voting membership, disregard for public comments and rights of the press and public to record proceedings, and the many millions of dollars of corporate foundation funding which will ultimately enrich other corporate entities, calls into question the legitimacy of the entire TFR process.
- There is insufficient information provided by this agency to make any informed comment possible on the 5 Year Transition Plan.
- The timber volumes proposed in this plan far exceed present market realities.
- The undisclosed environmental and economic impacts associated with the intent to establish a biomass industry on TNF still need to be scientifically and economically vetted and revealed to the public.
- The deregulation and unprecedented agency failure to provide meaningful details explaining the management rationale, the biological impacts and timber economics of this Plan make clear the environmental organizations purporting to represent the best interests of the public at the TFR, have compromised their integrity by being paid as corporate collaborators.
- The TFR can, in no way, represent or replace a legitimate public process.

Sincerely,
David Beebe
P.O. Box 148
Petersburg
AK 99833

(I am also sending by email, and please also include in these comments, "Woody Biomass, Carbon, Climate Change, and the Tongass Futures Roundtable".pdf, which was presented to and summarily ignored by the TFR membership.)